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Attorneys for the United States

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,

Plaintiff,

vs.

James B. Panther, Jr.,
a/k/a “James Suqui” and “James
Suquilanda,”

Defendant.

Case No. 2:19-CR-448-2

**NOTICE TO ADMIT FOREIGN
BUSINESS RECORDS UNDER 18
U.S.C. § 3505**

The government hereby provides written notice of its intent to introduce foreign business records under 18 U.S.C. § 3505. 18 U.S.C. § 3505(b). The government intends to introduce bank records from Compagnie Bancaire Helvétique (CBH) received from Switzerland pursuant to a Mutual Legal Assistance Treaty (“MLAT”). These records, which were produced to the defendant in Rule 16 discovery, are accompanied by a foreign certification attest[ing] that—

(A) such record was made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;

(B) such record was kept in the course of a regularly conducted business activity;

1 (C) the business activity made such a record as a regular practice; and
2 (D) if such record if not the original, such record if a duplicate of the original.

3 *Id.* § 3505(a)(1).

4 Dated: April 27, 2020

5 Respectfully submitted,

6 ROBERT ZINK
7 Chief, Fraud Section

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9 By: /s/ Michelle Pascucci
10 Tracee Plowell, Senior Litigation Counsel
11 Michelle Pascucci, Trial Attorney
12 Fraud Section, Criminal Division
13 U.S. Department of Justice
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on April 27, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification to counsel of record.

Respectfully submitted,

BY: /s/ Michelle Pascucci